



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION I**

**5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

**NOV 09 2015**

Mr. John Cloonan  
Director of Public Works  
Suffield Department of Public Works  
2230C Mountain Road  
Suffield, Connecticut 06078

Re: PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c)  
and § 761.79(h)  
Kent Memorial Library  
Suffield, Connecticut

Dear Mr. Cloonan:

This is in response to the Town of Suffield (the Town) Notification<sup>1</sup> for approval of a proposed plan to address PCB contamination located in the building known as Kent Memorial Library, ("the Site") at 50 North Main Street, Suffield, Connecticut. The Site contains PCB-contaminated materials that exceed the allowable PCB levels under 40 CFR § 761.20(a), § 761.61, and § 761.62. Specifically, PCBs have been found in caulk, glazing, and in the adjacent building substrates (e.g., brick) and in soil.

In its Notification the Town has proposed the following PCB remediation plan;

- o Remove all window systems (i.e., PCB caulk greater than or equal to ( $\geq$ ) 1 part per million (ppm), window frame, glass, and glazing and associated brick to a minimum distance of 9 inches from the joint), and dispose of as *PCB bulk product waste* in accordance with § 761.62(a)

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<sup>1</sup> The Notification was prepared by TRC, on behalf of the Town of Suffield to satisfy the requirements under 40 CFR §§ 761.61(a) and (c) and § 761.79(h). Information was submitted dated May 29, 2015 (Self-Implementing Cleanup Plan (SIP) for PCBs) and July 2015 (Risk-Based Plan); July 24, 2015 (Response to EPA Comments); September 24, 2015 (Revised Risk-based Plan and 2<sup>nd</sup> Response to EPA Comments); October 13, 2015 (email response to EPA soil removal question); October 22, 2015 (email response to encapsulation questions); October 23, 2015 (email response to transformer question); October 27, 2015 (email response to indoor air sampling question); and November 3, 2015 (draft MMIP response to indoor air standard question). These submittals shall be referred to as the "Notification".

- o Encapsulate PCB-contaminated *porous surfaces* (i.e., structural concrete) with an acrylic/epoxy coating following removal of the caulk as specified:
  - Exterior structural concrete walls to a minimum distance of 12 inches from the caulk joint. Interior structural concrete walls to a minimum distance of 15 inches from the caulk joint
  - Entire side of the interior/exterior columns where in contact with the caulk
  - Interior concrete ceilings to a minimum distance of 21 inches from the caulk joint
  - Exterior concrete ceilings to a minimum distance of 12 inches from the caulk line
- o Collect wipe samples from the encapsulated surfaces to confirm that the encapsulation has been effective
- o Remove *PCB remediation waste* with  $\geq 1$  ppm PCBs (i.e., soil and brick surface covers) located within 5 feet of the foundation and to a depth of one foot below the soil surface in the areas shown on figure 5 of the revised Notification dated September 2015 and dispose in accordance with § 761.61(a)(5)(i)(B)(2)(iii)
- o Conduct verification sampling of bulk *PCB remediation waste* (i.e., soil) in accordance with 40 CFR Part 761 Subpart O to confirm that the PCB concentrations are less than or equal to ( $\leq$ ) 1 ppm

Based on the EPA's review, the information provided in the Notification meets the requirements under § 761.62 and § 761.79(h) for abatement of PCB caulk, § 761.61(a) for cleanup of PCB-contaminated ground surfaces, and § 761.61(c) for decontamination and/or encapsulation of PCB-contaminated building surfaces. EPA finds that the proposed encapsulation should effectively prevent direct exposure of these PCB-contaminated surfaces to building users provided the encapsulated surfaces are maintained. As such, EPA may approve the encapsulation under § 761.61(c).

EPA encourages the compliance with greener cleanup practices for all cleanup projects, and recommends adherence to the ASTM Standard Guide to Greener Cleanups E2893-13 (Guide) for work conducted under this Approval and the Notification. Greener cleanups is the practice of integrating options that minimize the environmental impacts of cleanup actions in order to incorporate practices that maximize environmental and human benefit. Please see Section 6 of the Guide for the Best Management Practices (BMP) Process dated December 19, 2013. (See [www.astm.org/Standards/E2893.htm](http://www.astm.org/Standards/E2893.htm) for additional information) EPA encourages you to review the Guide and implement any practices that are feasible. If implemented, the PCB completion report should include a section on BMP Documentation, as described in Section 6.6.5 of the Guide.

The Town may proceed with its project in accordance with 40 CFR §§ 761.61(a) and (c); § 761.62; § 761.79(h); its Notification; and, this Approval, subject to the conditions of Attachment 1. Under this Approval, EPA is reserving its right to require additional investigation or mitigation measures should the results of the long-term monitoring indicate an unreasonable risk to the building users.

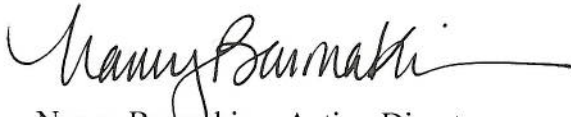
Please note that the Town will be required to record a notation on the deed for the Site as required under § 761.61(a)(8) since PCBs at greater than (>) 1 ppm will remain on the Site.

Questions and correspondence regarding this Approval should be directed to:

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912  
Telephone: (617) 918-1527  
Facsimile: (617) 918-0527

EPA shall not consider this project complete until it has received all submittals required under this Approval. Please be aware that upon EPA receipt and review of the submittals, EPA may request any additional information necessary to establish that the work has been completed in accordance with 40 CFR Part 761, the Notification, and this Approval.

Sincerely,



Nancy Barmakian, Acting Director  
Office of Site Remediation & Restoration

cc Henry J. Laliberte, TRC  
Gary Trombly, CTDEEP  
File

Attachment 1 – PCB Approval Conditions



**ATTACHMENT 1:**

**PCB CLEANUP AND DISPOSAL APPROVAL CONDITIONS  
KENT MEMORIAL LIBRARY (the Site)  
50 NORTH MAIN STREET  
SUFFIELD, CONNECTICUT**

**GENERAL CONDITIONS**

1. This Approval is granted under the authority of Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the PCB regulations at 40 CFR Part 761, and applies solely to the *PCB bulk product waste* and the *PCB remediation waste* located at the Site and identified in the Notification.
2. The Town of Suffield (the Town) shall conduct on-site activities in accordance with the conditions of this Approval and with the Notification.
3. In the event that the cleanup plan described in the Notification differs from the conditions specified in this Approval, the conditions of this Approval shall govern.
4. The terms and abbreviations used herein shall have the meanings as defined in 40 CFR § 761.3 unless otherwise defined within this Approval.
5. The Town must comply with all applicable federal, state and local regulations in the storage, handling, and disposal of all PCB wastes, including PCBs, PCB Items and decontamination wastes generated under this Approval. In the event of a new spill during response actions, the Town shall contact EPA within 24 hours for direction on PCB cleanup and sampling requirements.
6. The Town is responsible for the actions of all officers, employees, agents, contractors, subcontractors, and others who are involved in activities conducted under this Approval. If at any time the Town has or receives information indicating that the Town or any other person has failed, or may have failed, to comply with any provision of this Approval, it must report the information to EPA in writing within 24 hours of having or receiving the information.
7. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by the Town are authorized to conduct the activities set forth in the Notification. The Town is responsible for ensuring that its selected transporters and disposal facilities are authorized to conduct these activities in accordance with all applicable federal, state and local statutes and regulations.

8. This Approval does not: 1) waive or compromise EPA's enforcement and regulatory authority; 2) release the Town from compliance with any applicable requirements of federal, state or local law; or 3) release the Town from liability for, or otherwise resolve any violations of federal, state or local law.
9. Failure to comply with the Approval conditions specified herein shall constitute a violation of the requirement in § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761 Subpart D.

#### **NOTIFICATION AND CERTIFICATION CONDITIONS**

10. This Approval may be revoked if the EPA does not receive written notification from the Town of its acceptance of the conditions of this Approval within 10 business days of receipt.
11. The Town shall submit the following information to EPA:
  - a. a certification signed by its selected abatement/demolition contractor, stating that the contractor(s) has read and understands the Notification, and agrees to abide by the conditions specified in this Approval;
  - b. a contractor work plan, prepared and submitted by the selected demolition or abatement contractor(s) describing the containment and air monitoring that will be employed during abatement activities. This work plan should also include information on how and where wastes will be stored and disposed of, and on how field equipment will be decontaminated; and,
  - c. a certification signed by the selected analytical laboratory, stating that the laboratory has read and understands the extraction and analytical method requirements and quality assurance requirements specified in the Notification and in this Approval.

#### **DECONTAMINATION AND DISPOSAL CONDITIONS**

12. To the maximum extent practical, engineering controls, such as barriers, and removal techniques, such as the use of HEPA ventilated tools, shall be utilized during removal processes. In addition, to the maximum extent possible, disposable equipment and materials, including PPE, will be used to reduce the amount of decontamination necessary.
13. All visible residues of *PCB bulk product waste* (i.e., PCB caulk) shall be removed as described in the Notification.



14. The decontamination standard for unencapsulated *porous surfaces* (i.e., brick) shall be less than or equal to ( $\leq$ ) 1 part per million (ppm).
  - a. Sampling for *porous surfaces* shall be performed on a bulk basis (i.e., mg/kg) and reported on a dry weight analysis. Sampling for *porous surfaces* shall be conducted in accordance with the EPA Region 1 *Standard Operating Procedure for Sampling Porous Surfaces for Polychlorinated Biphenyls (PCBs) Revision 4, May 5, 2011*, at a maximum depth interval of 0.5 inches. Verification samples shall be collected at the frequency specified in 40 CFR Part 761 Subpart O.
  - b. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.
15. Following encapsulation of greater than ( $>$ ) 1 ppm PCB-contaminated *porous surfaces* (i.e., concrete walls, columns, ceilings, and granite) with an epoxy/acrylic coating, sampling shall be conducted to determine the effectiveness of the encapsulation.
  - a. Wipe sampling of encapsulated *porous surfaces* shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e.  $\mu\text{g}/100\text{ cm}^2$ ). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction or analytical method(s) is validated according to Subpart Q.
  - b. In the event that the PCB concentration of any wipe sample is  $> 1\text{ }\mu\text{g}/100\text{ cm}^2$  and if the  $\leq 1\text{ }\mu\text{g}/100\text{ cm}^2$  standard cannot be achieved with the application of additional encapsulant, the Town shall contact EPA for further discussion and direction on alternatives.
16. The cleanup standard for *PCB remediation waste* (i.e., soil and brick surface covers) shall be  $\leq 1$  ppm for unrestricted use or disposal.
  - a. All verification samples of *PCB remediation waste* shall be collected on a bulk basis (i.e., mg/kg) in accordance with 40 CFR 761 Subpart O.
  - b. Chemical extraction for PCBs shall be conducted using Methods 3500B/3540C of SW-846; and, chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another extraction/analytical method(s) is validated according to Subpart Q.

17. Post-abatement indoor surface sampling and indoor air sampling shall be conducted to document the effectiveness of the abatement work and encapsulation.
  - a. Wipe sampling of unencapsulated indoor surfaces shall be performed on a surface area basis by the standard wipe test as specified in 40 CFR § 761.123 (i.e.  $\mu\text{g}/100\text{ cm}^2$ ). Chemical extraction for PCBs shall be conducted using Method 3500B/3540C of SW-846 and chemical analysis for PCBs shall be conducted using Method 8082 of SW-846, unless another method(s) is validated according to Subpart Q. The laboratory reporting limit shall be  $\leq 1\text{ }\mu\text{g}/100\text{ cm}^2$ .
  - b. Indoor air sampling shall be conducted in accordance with EPA Method TO-10A or EPA Method TO-4A. Sufficient sample volumes shall be collected to provide a laboratory reporting limit of  $\leq 0.050\text{ }\mu\text{g}/\text{m}^3$  for total PCBs. PCB analysis shall be conducted for PCB homologues and/or PCB congeners.
  - c. In the event that the PCB concentration of any wipe sample is  $> 1\text{ }\mu\text{g}/100\text{ cm}^2$  or if any indoor air sample is  $> 200\text{ ng}/\text{m}^3$ , the Town shall contact EPA for further discussion and determination if any further action is required.
18. PCB waste (at any concentration) generated as a result of the activities described in the Notification, excluding any decontaminated materials, shall be marked in accordance with 40 CFR § 761.40; stored in a manner consistent with 40 CFR § 761.65; and, disposed of in accordance with 40 CFR § 761.61 or § 761.62, unless otherwise specified below.
  - a. Decontamination wastes and residues shall be disposed of in accordance with 40 CFR § 761.79(g)(6).
  - b. Moveable equipment, tools, and sampling equipment shall be decontaminated in accordance with either 40 CFR § 761.79(b)(3)(i)(A), § 761.79(b)(3)(ii)(A), or § 761.79(c)(2).
  - c. PCB-contaminated water generated during decontamination shall be decontaminated in accordance with 40 CFR § 761.79(b)(1) or disposed of under § 761.60.



### **DEED RESTRICTION AND USE CONDITIONS**

19. Within thirty (30) days of completing the activities described in the Notification and in the Approval, the Town shall submit for EPA review and approval, a draft deed restriction for the Site where PCBs > 1 ppm remain. The deed restriction shall include: a description of the extent and levels of contamination at the Site following abatement; a description of the actions taken at the Site; a description of the use restrictions for the Site, if any; and, the long-term monitoring and maintenance requirements on the Site. Within seven (7) days of receipt of EPA's approval of the draft deed restriction, the Town shall record the deed restriction. A copy of this Approval shall be attached to the deed restriction.

### **INSPECTION, MODIFICATION AND REVOCATION CONDITIONS**

20. Within 60 days of completion of the work authorized under this Approval, the Town shall submit for EPA's review and approval, a detailed monitoring and maintenance implementation plan (MMIP) for the surface barriers, for indoor air, and for interior building dust monitoring. The Town shall incorporate any changes to the MMIP required by EPA.
  - a. The MMIP shall include: a description of the activities that will be conducted, including inspection criteria, frequency, and routine maintenance activities; sampling protocols, sampling frequency, and analytical criteria; and, reporting requirements, as applicable.
  - b. The MMIP shall include a communications component which details how the maintenance and monitoring results will be communicated to the Site users, including library patrons, other on-site workers, and interested stakeholders.
  - c. The MMIP also shall include a worker training component for maintenance workers or for any person that will be conducting work that could impact the barriers encapsulating the PCB-contaminated surfaces.
  - d. The Town shall submit the results of these long-term monitoring and maintenance activities to EPA. Based on its review of the results, EPA may determine that modification to the MMIP is necessary in order to monitor and/or evaluate the long-term effectiveness of the barriers.
  - e. Activities required under the MMIP shall be conducted until such time that EPA determines, in writing, that such activities are no longer necessary.



21. The Town shall allow any authorized representative of the Administrator of the EPA to inspect the Site and to inspect records and take samples as may be necessary to determine compliance with the PCB regulations and this Approval. Any refusal by the Town to allow such an inspection (as authorized by Section 11 of TSCA) shall be grounds for revocation of this Approval.
22. Any modification(s) in the plan, specifications, or information submitted by the Town, contained in the Notification, and forming the basis upon which this Approval has been issued, must receive prior written approval from the EPA. The Town shall inform the EPA of any modification, in writing, at least ten (10) days prior to such change. No action may be taken to implement any such modification unless the EPA has approved of the modification, in writing. The EPA may request additional information in order to determine whether to approve the modification.
23. If such modification involves a change in the use of the Site which results in exposures not considered in the Notification, the EPA may revoke, suspend, and/or modify this Approval upon finding that this risk-based cleanup and disposal action may pose an unreasonable risk of injury to health or the environment due to the change in use. EPA may take similar action if the EPA does not receive requested information needed from the Town to make a determination regarding potential risk.
24. Any misrepresentation or omission of any material fact in the Notification or in any records or reports may result in the EPA's revocation, suspension and/or modification of the Approval, in addition to any other legal or equitable relief or remedy the EPA may choose to pursue.

#### **RECORDKEEPING AND REPORTING CONDITIONS**

25. The Town shall prepare and maintain all records and documents required by 40 CFR Part 761, including but not limited to the records required under Subparts J and K. A written record of the cleanup and disposal and the analytical sampling shall be established and maintained by the Town in one centralized location, until such time as EPA approves in writing a request for an alternative disposition of such records. All records shall be made available for inspection to authorized representatives of EPA.
26. As required under Condition 20 of this Approval, the Town shall submit the results of the long-term monitoring and maintenance activities to EPA as specified in the final MMIP to be approved by EPA.

27. The Town shall submit a final report as both a hard copy and electronic version (e.g., CD-ROM), to the EPA within 90 days of completion of the activities authorized under this Approval. At a minimum, this final report shall include: a short narrative of the project activities with photographic documentation and Greener Cleanups BMP documentation, if implemented; characterization and confirmation sampling analytical results; copies of the accompanying analytical chains of custody; field and laboratory quality control/quality assurance checks; an estimate of the quantity of PCB waste disposed of; copies of manifests and bills of lading; and, copies of certificates of disposal or similar certifications issued by the disposer. The Report shall also include a copy of the recorded deed restriction and a certification signed by a Town official verifying that the deed restriction has been recorded as required and that the authorized activities have been implemented in accordance with this Approval and the Notification.
28. Required submittals shall be mailed to:
- Kimberly N. Tisa, PCB Coordinator  
United States Environmental Protection Agency  
5 Post Office Square, Suite 100 – (OSRR07-2)  
Boston, Massachusetts 02109-3912  
Telephone: (617) 918-1527  
Facsimile: (617) 918-0527
29. No record, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

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**END OF ATTACHMENT 1**